UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Plaintiff A, Plaintiff B, Plaintiff JAN, Chun Pey, and Others Similarly Situated, Plaintiffs, v. WANG, Taihua, Communist Party Secretary of Anhui Province, and formerly Governor of Anhui Province of the People's Repulic of China, Defendant.	Case Number: Civil Tort Liability Claim Jury Trial Requested

04 CV 11022 EFH

MOTION TO WITHHOLD IDENTITIES OF PLAINTIFFS NAMED IN THE COMPLAINT

1. Given the nature of the major human rights abuses that are the subject of this complaint, the fact that the Plaintiffs named in the complaint have been subjected to arbitrary detention, torture and other forms of persecution and abuse in the past because of their beliefs, practices and associations, and the clear and present threat that identification of their names to the Defendant and to other officials of the People's Republic of China would have for the Plaintiffs themselves, and for members of their families, many of whom still reside within the PRC, Plaintiffs hereby request that the Court authorize the use of alphabetic designations for the Plaintiffs in all public records, documents, and references regarding this case, and maintain the secrecy of the identities of the Plaintiffs.

2. Plaintiffs undertakes to make available to the Court on request, *in camera*, and for purposes of review by the Court without public disclosure, copies of all records available to

counsel regarding the Plaintiffs, including copies of signed, witnessed and notarized statements of the Plaintiffs providing details regarding their identity, personal situation and status.

3. Plaintiffs attest and confirm that disclosure of the identities of the Plaintiffs could well endanger their physical well-being, and the physical well-being of their family members, in the most serious ways.

Respectfully Submitted this 21st day of May, 2004

By:

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On behalf of
Plaintiff A, Plaintiff B, and
Plaintiff JAN, Chun Pey
PRO SE